



## **APPENDIX B**

***“Florida Department of Environmental Protection Guidance for  
Establishment, Operation and Closure of Staging Areas for Storm-generated Debris  
with or without Deepwater Horizon Oil Spill Debris June 25, 2010”***



*Florida Department of Environmental Protection  
Guidance for Establishment, Operation and Closure of  
Staging Areas for Storm-generated Debris with or  
without Deepwater Horizon Oil Spill Debris*

*June 25, 2010*

General Information

1. The Department of Environmental Protection (Department) understands that in addition to other requirements by the Federal Emergency Management Agency (FEMA), staging areas must be approved by the Department in order for the owner/operator of the staging area to receive Public Assistance funds from FEMA. Field authorizations for staging areas by the Department may be issued prior to or following a site inspection by Department personnel for staging areas to be used for temporary storage and processing of storm-generated debris (hereinafter called "storm debris"). Field authorizations for debris staging areas may only be issued by the Department subsequent to an Executive Order by the Governor declaring a state of emergency or an Emergency Final Order by the Secretary of the Department authorizing debris staging areas.
2. This guidance document does not apply to management of oil spill debris from the Deepwater Horizon Oil Spill (hereinafter called "the Spill"), which commenced on April 20, 2010, except to the extent that oil spill debris may be mixed with storm debris. Oil debris cleanup activity is otherwise authorized under Emergency Final Order OGC No. 10-1610, as amended, and field authorizations for staging areas to address the oil debris are issued by the Department in accordance with that Order. These "oil spill debris staging areas" are separate from and should not be confused with "storm debris staging areas" that are addressed in this guidance.
3. If a storm event occurs resulting in the Department issuing an Emergency Final Order to address cleanup of debris from that storm, then the Spill may also result in oil from the Spill being mixed with this storm debris in the coastal areas of Florida. In those cases, this guidance does apply to staging areas that will be managing storm debris that is also mixed with oil from the Spill. Any storm debris mixed with this oil is considered a mixed waste and may be managed at an approved storm debris staging areas. It does not have to be handled separately from other mixed debris at the storm debris staging area, but it must be disposed of at permitted Class I landfills.
4. Field authorizations for storm debris staging areas (hereinafter called "staging areas") for managing storm debris with or without oil from the Spill may be requested by providing oral or written notice to the Department containing the following information.
  - A description of the staging area design: For example, is the staging area an open field or paved? Is it near bodies of water or potable wells? What areas would be used for staging debris and for processing?

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- Plans for operation of the staging area: For example, will it be used for staging only or also processing? What wastes will be managed and what are the anticipated operating hours and days of the week when the site will be open? Who can bring wastes to the site? If processing occurs, what type is expected?
  - The location of the staging area should be provided including the address and, if possible, its latitude and longitude or directions from major roadways.
  - The name, address, and telephone number of the site manager should be provided.
5. The Department prefers that requests for approval of staging areas be made by solid waste officials in the county or city where the staging area is located. Such staging areas do not need to be owned by the local government but must have county or city (or its designated contractors) oversight and management. The Department may consider approving the private operation of staging areas on a case-by-case basis.
6. The owner or operator of each staging area should keep records of the amount and type of waste received, waste sent off-site for disposal or recycling, and waste left on-site. Such records can be very valuable for demonstrating that the staging area has been operated in accordance with applicable regulations and orders. These records should be kept at a location designated by the site manager and made available for review by Department staff upon request.

Location of Staging Areas

7. If possible, it is advisable to test the soil, groundwater and/or surface water at a proposed staging area prior to receipt of storm debris to establish pre-existing conditions.
8. Staging areas for debris other than yard trash and uncontaminated vegetative debris must not be located within 500 feet of a potable water well, unless otherwise approved by the Department. Staging areas for yard trash and uncontaminated vegetative debris must not be located within 100 feet of a potable water well, unless otherwise approved by the Department.
9. Staging areas for debris other than yard trash and uncontaminated vegetative debris must not be located within 200 feet of a natural or artificial body of water, unless otherwise approved by the Department. Staging areas for yard trash and uncontaminated vegetative debris must not be located within 50 feet of a natural or artificial body of water, unless otherwise approved by the Department.
10. In no case should a staging area be located in wetlands or a water body.



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11. Staging areas should have:
  - Stormwater controls, such as silt fences, to prevent discharge of contaminated runoff into water bodies where such discharge may cause violations of Department standards (example: turbidity);
  - Some method to control the offsite migration of dust, wood chips or other debris residuals from vehicular traffic and from the handling of debris and ash;
  - Some type of access control to prevent unauthorized dumping and scavenging; and,
  - Spotters to correctly identify and segregate waste types for appropriate management.
12. All reasonable steps must be taken to minimize the release of contaminants from the storm debris at the staging area, especially if it is mixed with oil from the Spill. If contaminants are released into the environment, the entity operating the staging area must take immediate steps to contain the release and notify the Department within 24 hours.
13. Only construction and demolition debris, land clearing debris, yard trash, vegetative waste, or Class III waste may be stored at the staging area. Class I waste (such as household garbage, putrescible waste, mixed wastes containing these materials, or wastes visibly contaminated with oil from the Spill) must be removed from the staging areas and disposed of as soon as practicable to prevent odor, vectors and sanitary nuisances. Again, spotters should be used during waste pickup and/or at the staging areas to correctly identify and segregate waste types for appropriate management. The following management options for the storm debris must be followed.
  - Class I wastes, including all mixed wastes, must be disposed of at a Class I landfill or, except for asbestos-containing materials, in a waste-to-energy facility that is authorized to accept such wastes.
  - Non-recyclables and residuals generated from segregation of storm debris shall also be disposed of in a Class I landfill or waste-to-energy facility.
  - Uncontaminated yard trash may be disposed of in permitted lined or unlined landfills, permitted land clearing debris facilities or permitted construction and demolition debris disposal facilities.
  - Uncontaminated yard trash and clean wood may be processed at a registered

yard trash processing facility.

- Construction and demolition debris that is mixed with other storm debris need not be segregated from other solid waste prior to disposal in a lined landfill. Construction and demolition debris that is either source-separated or is separated from other storm debris at an authorized staging area and is not visibly contaminated with oil from the Spill may be managed at a permitted construction and demolition debris disposal or recycling facility, upon approval by the Department of the methods and operational practices used to inspect the waste during segregation.
- Unsalvageable refrigerators and freezers containing solid waste such as rotting food that may create a sanitary nuisance may be disposed of in a Class I landfill; provided, however, that chlorofluorocarbons and capacitors must be removed and recycled to the greatest extent practicable using techniques and personnel meeting the requirements of 40 CFR Part 82.

14. Burning of storm-generated yard trash, other vegetative debris, and in some cases demolition debris (provided reasonable efforts are made to limit the demolition debris being burned to untreated wood), including such materials that may be mixed with oil from the Spill, is allowed in air curtain incinerators (ACIs) if the conditions of the appropriate Emergency Final Order<sup>1</sup> are followed. The following additional information is provided for operation of the ACIs and management of the ash residue.

- The ACI burn area should have a minimum setback distance of 100 feet from the debris piles and 1000 feet from the nearest building, or as required by the local Fire Department.
- Ash should be removed from the ACI burn pit when the level reaches approximately two feet below the lip of the burn pit and the burn should be extinguished two hours before removal of the ash.
- As required in the Emergency Final Order, ash residue from the combustion of vegetative debris may be disposed of in a permitted disposal facility, or may be land spread in any areas approved by local government officials except in wellfield protection areas, wetlands, or water bodies.
- As required in the Emergency Final Order, ash from the combustion of other storm debris shall be disposed of in a Class I landfill.

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<sup>1</sup> The Emergency Final Orders can be obtained from the Department's website at the following address: <http://www.dep.state.fl.us/mainpage/em/>. The Emergency Final Orders also include information on the management of domestic wastewater residuals.



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15. Open pile burning of storm-generated vegetative debris must receive prior authorization from the Division of Forestry. Ash from this burning may be disposed or used as described above for ACIs. Open pile burning of storm debris contaminated with oil from the Spill is not allowed except as may be specifically provided in the Emergency Final Order.
16. Chipping and/or grinding of uncontaminated storm-generated vegetative debris is encouraged to help reduce the volume of the material. The Department recommends the following guidelines for managing the volume reduced material.
  - In accordance with National Fire Protection Association<sup>2</sup>, mulch and chip piles should not exceed 18 feet in height, 50 feet in width and 350 feet in length. Piles should be subdivided by fire lanes having at least 25 feet of clear space at the base around each pile. These piles should not be compacted.
  - Smoking should only be allowed in designated areas well away from the combustible material.
  - Possible uses of the size reduced material include: (1) a soil amendment where it is disked into the soil or mixed with potting soil; (2) as mulch for weed control, moisture retention, soil temperature control, erosion control or slope stabilization; (3) fuel; (4) feedstock for composting operations; (5) animal bedding material; and (6) pulp wood.
  - Use of the size reduced material as a soil amendment must be at normally accepted agronomic rates as determined by industry practice. Recommendations for appropriate application rates by the Institute of Food and Agricultural Sciences<sup>3</sup> (IFAS) may be used, and can be obtained from the local IFAS Agricultural Extension agent.
  - The use of mulch must be considered beneficial rather than disposal. Mulch must not be placed in water bodies or on wetlands.

Closure of Staging Areas

17. Staging areas for storm debris are temporary locations that can be used for the duration of the Emergency Final Order or as otherwise approved by the Department. The following guidelines apply to the closing of temporary staging areas.
  - Owner/operators of the staging areas must contact the Department prior to closing a staging area to discuss and coordinate what will be required for closure

<sup>2</sup> NFPA 230, "Standard for the Fire Protection of Storage"

<sup>3</sup> The web address for IFAS is <http://www.ifas.ufl.edu/>

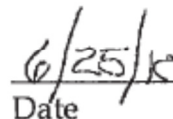
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including environmental sampling, if needed.

- All storm debris must be removed by the expiration of the Emergency Final Order, unless otherwise approved by the Department.
- Mulch produced from processing uncontaminated vegetative debris may be left on-site if prior approval is obtained from the Department. The Department will consider these requests on a case-by-case basis.
- Areas that were only used to stage uncontaminated vegetative debris, or ash from burning solely vegetative debris, will not require any environmental sampling after the debris or ash is removed unless there is reason to believe that the area may have become contaminated (e.g., significant visible staining or known contaminant releases in the area).
- Areas that were used to stage mixed debris, or ash from burning mixed debris, will normally require environmental sampling after the debris or ash is removed unless there is reason to believe that no contamination of the area occurred (e.g., the area is paved with asphalt or concrete and there is no visible evidence of staining or known contaminant releases).
- When environmental sampling for soils and groundwater is needed, it should typically include at least one soil sample and one groundwater monitoring well in areas showing significant visible staining or areas believed to be impacted by the staged waste or ash. Unless otherwise approved by the Department, these samples should normally be analyzed for total RCRA metals, volatile organic compounds and semi-volatile organic compounds using approved EPA methods. The Department can also require other approaches to conducting environmental sampling at staging areas on a case-by-case basis.

18. The Department must be informed in writing when all closure activities at the staging area are completed. If environmental sampling was conducted as part of the closure activities, then the closure notice should include the results of this sampling, unless otherwise approved by the Department.

  
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Mary Jean Yon, Director  
Division of Waste Management

  
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